

BINDER & SCHWARTZ LLP

Eric B. Fisher
Neil S. Binder
Lindsay A. Bush
Lauren K. Handelsman
366 Madison Avenue, 6th Floor
New York, New York 10017
Telephone: (212) 510-7008
Facsimile: (212) 510-7299

*Attorneys for the Motors Liquidation
Company Avoidance Action Trust*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re:

MOTORS LIQUIDATION COMPANY, f/k/a
GENERAL MOTORS CORPORATION, *et al.*,

Chapter 11

Case No. 09-50026 (MG)
(Jointly Administered)

Debtors.

-----X

**CERTIFICATE OF NO OBJECTION TO MOTION OF MOTORS LIQUIDATION
COMPANY AVOIDANCE ACTION TRUST FOR ENTRY OF AN ORDER
AUTHORIZING THE WIND-DOWN AND DISSOLUTION OF THE AAT
AND GRANTING RELATED RELIEF**

On March 2, 2021, Wilmington Trust Company, as Trust Administrator and Trustee of the Motors Liquidation Company Avoidance Action Trust (the “AAT”), filed the motion pursuant to Bankruptcy Code sections 105(a), 554, and 1142 and Bankruptcy Rule 6007 seeking entry of an order, (i) authorizing the wind-down and dissolution of the AAT, (ii) discharging and exculpating the AAT Administrator and AAT Monitor and their employees and professionals, (iii) authorizing the destruction of the AAT’s books and records, and (iv) authorizing the Clerk’s Office to dispose of any hard copies of, or electronic storage devices with, documents filed under seal in the adversary proceeding commenced by the AAT, Adv. Pro. No. 09-00504, in a way that protects the confidentiality of those documents consistent with the orders that authorized the filing of documents under seal, (Bankr. Dkt. No. 14786) (the “**Motion**”).

Pursuant to Rule 9075-2 of the Local Bankruptcy Rules for the Southern District of New York,

the undersigned certifies that, as of the date hereof, which is more than forty-eight (48) hours after the objection deadline, Binder and Schwartz LLP, counsel for the AAT (“**Binder & Schwartz**”), has received no objection to the Motion.

The undersigned further certifies that Binder & Schwartz caused the Motion and Notice of Hearing on the Motion (the “**Notice of Hearing**”) to be served in accordance with the Court-approved notice procedures, *see Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) and Bankruptcy Rules 1015(c) and 9007 Establishing Notice and Case Management Procedures*, dated May 5, 2011 (Bankr. Dkt. No. 10183), which includes notice to (a) the potential beneficiaries of the AAT, including the holders of Allowed General Unsecured Claims (as defined in the AAT Agreement); (b) the GUC Trust; (c) the DIP Lenders; (d) the Office of the United States Trustee for the Southern District of New York; (e) counsel to the ELPs Signatory Plaintiffs, and (f) counsel to New GM. *See* Affidavit of Service (Bankr. Dkt. No. 14789). Further, this Motion was filed on the bankruptcy docket in the chapter 11 cases, Bankr. Dkt. No. 14786.

Pursuant to the Notice of Hearing, responses to the Motion were to be filed with the Court and served on the Avoidance Action Trust no later than March 9, 2021, at 4:00 p.m. (Eastern Time) (the “**Response Deadline**”). The notice specifically stated that if no responses were received by the Response Deadline, then the relief requested in the Motion could be granted without further notice or hearing.

The undersigned further certifies that, as of the date hereof, based upon review of the Court’s docket in this case, no objection to the Motion has been filed.

WHEREFORE, the Avoidance Action Trust respectfully requests that, at the earliest convenience of the Court, an order be entered granting the Motion.

Dated: March 15, 2021
New York, New York

Respectfully submitted,

BINDER & SCHWARTZ LLP

/s/ Eric B. Fisher
Eric B. Fisher
Neil S. Binder
Lindsay A. Bush
Lauren K. Handelsman
366 Madison Avenue, 6th Floor
New York, New York 10017
Tel: (212) 510-7008

*Attorneys for the Motors Liquidation
Company Avoidance Action Trust*